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10 *Attorneys for Plaintiff*  
11 JAMES RUTHERFORD

12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 JAMES RUTHERFORD, an  
15 individual,

16 Plaintiff,

17 v.

18 PACO'S TACOS, a business of  
19 unknown form; KAMALEDDIN  
20 ABDOLRAHIMI AND MARY  
21 VOSOUGHI, as individuals and  
22 as husband and wife as joint  
23 tenants, a California limited  
24 liability company; and DOES 1-  
25 10, inclusive,

26 Defendants.

Case No.: 5:18-cv-02037-AB-SPx

Hon. Andre Birotte Jr.

**NOTICE OF VOLUNTARY  
DISMISSAL WITH PREJUDICE  
PURSUANT TO FEDERAL RULE OF  
CIVIL PROCEDURE 41(a)(1)(A)(i)**

Complaint Filed: September 24, 2018  
Trial Date: None

**TO THE COURT AND ALL PARTIES:**

Pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Plaintiff James Rutherford ("Plaintiff") requests that this Court enter a dismissal with prejudice of Plaintiff's Complaint in the above-entitled action, in its entirety. Each party shall bear his or its own expert fees, costs and expenses and attorneys' fees.

Respectfully submitted,

DATED : December 4, 2018

**MANNING LAW, APC**

By: /s/ Joseph R. Manning, Jr.

Joseph R. Manning, Jr.  
Attorney for Plaintiff  
James Rutherford

**CERTIFICATE OF SERVICE**

I certify that on December 4, 2018, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on counsel of record in this action via email transmission and via transmission of Electronic Filing generated by CM/ECF.

Respectfully submitted,

Dated: December 4, 2018

**MANNING LAW, APC**

By: /s/ Joseph R. Manning, Jr., Esq.  
Joseph R. Manning, Jr., Esq.  
Attorney for Plaintiff,  
James Rutherford